

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

gnydenskiy@faillacelaw.com

November 21, 2020

BY ECF

Honorable Steven M. Gold
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Cespedes v. Newmark Wood Working Group Inc. et al
Case No. 20-cv-2464 RPK SMG

Your Honor:

I am an attorney with Michael Faillace & Associates, P.C., attorneys for Plaintiff in the above-referenced matter. We write to request a 60 day deadline to submit Plaintiff's motion for default Judgment. The Defendants were served in June 2020 but, have not appeared or answered. Therefore, we respectfully request a 60 day deadline to submit Plaintiff's motion for default Judgment.

Respectfully Submitted,

/s/Gennadiy Naydenskiy, Esq.

Gennadiy Naydenskiy, Esq.

MICHAEL FAILLACE & ASSOCIATES, P.C.

Attorneys for Plaintiffs